Jasmine Cuenco

From: Aron DeFerrari

Sent: Wednesday, January 27, 2021 4:01 PM

To: Chavez, Amanda, DA **Subject:** RE: 745 Motions

Attachments: Disco Request - 2020.12.10.pdf

Hey Amanda,

Thank you! Katie and I are very excited for her brother and sister in law – now we can hold a baby again – and then give her back when she starts to cry

I'm attaching the only PC 745 motion we've received that I know about...it is entirely possible there are others but I kind of work in a silo. Also, note that this is from a private attorney, my guess is our PD's Office has something much nastier sharpened up for us.

As to your second questions: I have no clue how we are collating data for purposes of litigating these motions. However, I am going to cut a separate email and copy you in with my buddy Ryan Wagner. Ryan runs our Law & Motion Unit, my hope is that he can be more helpful on the topic re how we are approaching these generally.

Sorry I can't be of more help.

Take care,

Aron J. DeFerrari
Homicide Team
Contra Costa County District Attorney's Office
Direct Line:

From: Chavez, Amanda, DA

Sent: Wednesday, January 27, 2021 3:50 PM

To: Aron DeFerrari **Subject:** 745 Motions

Hi Aron,

Hope you are doing well! Congrats on being an uncle!

Can you send me a sampling of the PC 745 motions that have been filed in CoCo County? Also, any idea how you all are keeping track of charging stats for PC 745 purposes? I keep meaning to call but every time I remember I can't talk so I'm sending this email instead.

Thanks, Amanda Amanda Chavez

Deputy District Attorney

Alameda County District Attorney's Office